

CGB-CC-0537

Received & Inspected

JAN 20 2012

FCC Mail Room

New Testament Church,
PO Box 748
6772 Lamphear Rd
Rome NY 13442-0748

January 18, 2012

Commission of the Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW.
Washington, DC 20554

Re: Request for Closed Captioning Exemption
CGB-CC-0537

I am the producer "Glory to Glory" a weekly religious television program for New Testament Church. It airs Sundays on WUTR. My small video production company uses our own equipment to produce, shoot and edit the program as a pro-bono service to the church. The program is a half hour (28:30) of the weekly sermon. As our pastor preaches extemporaneously with just a few notes, there is no transcript of the program.

We are requesting an exemption to the closed caption ruling because it would be an undue burden not only on New Testament Church, but on the production company that my husband and I own, Media Partners Group. My husband shoots and edits 52 weeks of sermons. Each show is normally broadcast only once, therefore having no repeat value. Adding closed captioning to the program would add more time and work to what we do for free.

Although we agree that closed captioning our message would provide a service to the hearing impaired and deaf community we simply do not have the resources to provide it. Enclosed, please find a financial statement of New Testament Church income and expenses,

We have looked into proving Closed Captioning and have not found a way that New Testament Church can afford it. Quotes that we have received from close captioning providers range from \$210 to \$87 per episode. The cost to broadcast our program on WUTR is \$150 per week. As you can see, adding closed captioning would nearly double New Testament Church's budget for television.

We have also looked into purchasing a Closed Captioning System. We have received a quote of \$1,600 for a system that seems easy to use. However, New Testament Church has not identified a volunteer(s) that would be able to commit to transcribe the audio faithfully on a weekly basis. Even if this was not a factor, New Testament Church does not have a budget surplus that would allow such a large purchase.

Like in much of the country, many of our parishioners are hurting economically. We cannot ask them to give more. Over the past years, approaching area business and possible benefactors to sponsor or fund closed captioning and other church projects and ministries have proven to be unsuccessful.

Our homebound members and some viewers who do not go to church regularly look forward to the weekly program. We believe that "Glory to Glory" meets a spiritual need in the community. Unfortunately, if closed captioning were required at this time, New Testament Church would no longer have the financial means to broadcast it, and we would have to go off the air

On behalf of Pastor Salloum, the Trustees and members of New Testament Church, I ask the FCC to grant "Glory to Glory" an exemption to closed captioning requirements.

Karen Suskie Morrissey

kim@mpgfilms.com

315 723-2601

NEW TESTAMENT CHURCH, INC.

P.O. Box 748
6772 Lamphear Road
Rome, New York 13442-0748

To whom it may concern, the following are the income and expense statement for the New Testament Church for 2010.

EXPENSES:

Payroll	\$ 33,892.56
Housing Allowance	\$ 18,213.17
Payroll Taxes	\$ 11,398.85
Lamphear Rd Mortgage	\$ 18,195.00
Lamphear Rd Utilities	\$ 4,641.35
Insurance	\$ 4,523.95
Lamphear Rd Maintenance	\$ 3,816.15
Medical Insurance	\$ 16,375.96
Guest Speaker Disbursement	\$ 14,796.15
Guest Speaker Expense	\$ 1,322.57
Telephone	\$ 3,800.21
Pastor's Expense Account	\$ 2,099.24
Office supplies	\$ 1,093.84
Church supplies	\$ 1,274.15
Auto Expense	\$ 7,834.56
Advertising	\$ 1,554.59
Missions	\$ 1,488.00
Postage	\$ 61.60
West Dominick Mortgage	\$ 6,413.40
West Dominick Utilities	\$ 4,699.89
West Dominick Other	\$ 4,698.21
Property Taxes	\$ 344.88
Miscellaneous	\$ 1,405.88
Bank Expense	\$ 51.00
Benevolence	\$ 1,407.00
Music Ministry	\$ 539.00
Children's Ministry	\$ 132.00
Television Ministry	\$ 5,781.00
Life Insurance	\$ 1,976.30
Credit Card Payments	\$ 7,527.52

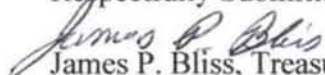
Total Expenses: \$181,357.98

RECEIPTS:

General	\$147,173.22
Love	\$ 14,122.84
Building	\$ 25.00
Youth	\$ 394.12
Missions	\$ 4,271.09
Benevolent	\$ 1,196.80
Rent	\$ 15,105.00
Other	\$ 2,839.95

Total Receipt: \$ 185,128.02

Respectfully Submitted:


James P. Bliss, Treasurer

Dated: 1/16/2012



WUTR
201 Humboldt Street
Rochester, NY 14610
ph: (585) 287-8894
fx: (585) 482-2515

Advertiser
Agency
Buyer
Salesperson

New Testament Church (23030)
Media Partners (11544)
Robidoux, Danielle (1367)
ph: (315) 797-5220

Invoice 1006746
Inv Date 12/25/2011
Terms Net 30
Contract 458476
Bill Type Standard
Period 11/28/2011 - 12/25/2011

Media Partners
188 Main St
NY Mills, NY 13417

SAGBo

Product Service - Religious Services (1132)
Brand Annual Pairs (121686)
Acct Types Local/Pd Prog Agency
Est/Headline /
Demo
Revision
Comments

CO-OP/Order Type No/Normal
Package
Gen. Date 12/27/2011 12:09:45PM

Utica (WUTR)

OFFICIAL BILLING INVOICE

Line	Type	Scheduled	Schedule Days to Run	Air Time	Length	Program	Copy/ISCI	Amount	Remarks
1.0	LONG	11:00:00AM-Paid Pro	Day,Su-1	12/04/11 11:00AM (Su)	28:30	Paid Program 11a	NEW TESTIMENT #458	\$150.00	
1.0	LONG	11:00:00AM-Paid Pro	Day,Su-1	12/11/11 11:01AM (Su)	28:30	Paid Program 11a	NEW TESTIMENT #459	\$150.00	
1.0	LONG	11:00:00AM-Paid Pro	Day,Su-1	12/18/11 11:00AM (Su)	28:30	Paid Program 11a	New Testament #460	\$150.00	
1.0	LONG	11:00:00AM-Paid Pro	Day,Su-1	12/25/11 11:00AM (Su)	28:30	Paid Program 11a	New Testament #461	\$150.00	

We warrant that the actual broadcast information shown on this invoice was taken from the official program log.

Gross Total	\$600.00
Commission	(\$90.00)
Net Total	\$510.00

Total Spots 4



January 15, 2012

Media Partners Group
188 Main Street
New York Mills NY 13417

315 768 0277
315 768 0278 fax

New Testament Church
6772 Lamphear Rd.
Rome, NY 13440

Dear Reverend Salloum,

I have received your request for assistance in close captioning of your program "Glory to Glory". Unfortunately at this time Media Partners Group is unavailable to provide such services on a volunteer basis, nor are able to sponsor this service.

My best wishes for future programming.

Sincerely Yours,

Walt Morrissey
Production Manager
Media Partners Group

From: Steve Ventura <sventura@wutr.tv>
Subject: RE: Close captioning request
Date: January 9, 2012 2:29:14 PM EST
To: Walt Morrissey <walt@mpgfilms.com>, Danielle Rejman <drejman@wutr.tv>

Walt,
Unfortunately, we are not able to do either. We use an outside service for all of our CC needs.

Steve

Stephen J. Ventura

Director of Sales, WFXV/WPNY/WUTR

Phone 315-272-1340

Fax 315-272-1967

STATEMENT OF CONFIDENTIALITY

This electronic message may contain privileged or confidential information. If you are not the intended recipient of this email, please delete it from your system and advise the sender.

WFXV/WUTR/WPNY does not discriminate in advertising contracts on the basis of race, ethnicity or gender and further requires that in the performance of all WFXV/WUTR/WPNY advertising agreements, WFXV/WUTR/WPNY require that each party does not discriminate on the basis of race or ethnicity.

-----Original Message-----

From: Walt Morrissey [mailto:walt@mpgfilms.com]
Sent: Monday, January 09, 2012 2:27 PM
To: Steve Ventura; Danielle Rejman
Subject: Close captioning request

Mr. Ventura,

The New Testament Church, in seeking options to secure close captioning services for our weekly "Glory to Glory" program which airs on your station.

I'm contacting you ask if your station can provide close captioning, or to assist in funding to help secure this service. We would be grateful for any assistance you could provide.

Sincerely yours,

Walt Morrissey
Media Partners Group
315 768-0277

From: Kara Stark <kara@automaticsync.com>
Subject: **Captioning services with AST**
Date: January 10, 2012 11:16:02 AM EST
To: walt@mpgfilms.com
▶ 2 Attachments, 247 KB

Walt,

Hello, I spoke with your colleague Kim today regarding captioning and transcription requirements for your organization. She asked me to forward you information on CaptionSync, AST's captioning solution. AST was funded through the US Dept of Education to create a captioning system that is cheaper, faster, and easier to use than traditional captioning.

Our system is entirely electronic - users submit content for captioning over the web and we will return caption results electronically. We can return a variety of result types, including caption files for podcasts, web media (QuickTime, Windows Media, Real, Flash), DVD authoring (caption and subtitle files), videotape encoding, and broadcast captioning. We also offer a number of other formats to support GoogleVideo and video search functions. You can get multiple caption result formats at no additional cost - you can request as many formats as you like.

We also offer transcription-only services if you are just after a transcript. We make extensive use of automation technologies to get the cost low, but our transcription is done by trained stenographers; we **do not** use speech-recognition technology to generate the transcripts due to the high error rate that such technology suffers from.

I have attached an overview of our system and our price sheet. As you can see, we charge \$184.80 per content hour (\$3.08 per minute) for transcript and caption files and we offer over 40 output types, all listed at <http://www.automaticsync.com/captionsync/support/result-formats/>

We are integrated with a wide variety of video platforms and lecture capture systems.

Kim mentioned that you use FCP to edit. FCP version 7 or newer will accept an .scc file, which is one that we offer.

To create an account on our system, please fill out the form at http://www.automaticsync.com/caption/sign_up.php

Please email or call me if you have any questions. Thanks!

--

Kara Stark

Automatic Sync Technologies

www.automaticsync.com/caption

Phn: 877-278-7962 x715



[AST CSync v.1.0.pdf \(51.0 KB\)](#)

CAPTIONS

Powered by **AUTOMATIC SYNC**
TECHNOLOGIES

www.automaticsync.com

877-AST-SYNC (877-278-7962)

Automated Captioning & Transcription Pricing

AST's CaptionSync web-automated captioning is straightforward and simple and significantly faster and less expensive than alternative captioning methods. Because CaptionSync is a web-based service, there is no software to purchase, and it is always available.

Simply upload your media to our CaptionSync server and select whether you want captioning, transcription, or both (a transcript is required in order to create caption output). The outputs you select are returned electronically - no need to ship anything.

From: "Maria T. Vondras" <mtvondras@vicaps.com>
Subject: **Quote for Closed Captioning Your Religious Program**
Date: January 10, 2012 4:22:14 PM EST
To: walt@mpgfilms.com
Cc: 'Constance Carlson' <ccarlson@vicaps.com>, 'Craig Hoffman' <crhoffman@vicaps.com>
2 Attachments, 33.5 KB

Hello Walt,

Your wife Kim asked me to email this quote over to you. Video Caption Corporation would be delighted to assist you with the Closed Captioning of your weekly 30 minute English language program. For purposes of this quote I am supplying you pricing based on two deliverables, DVCPRO25 tape and caption data file. As I understand it, you would provide your program to us on DVCPRO25 or as a low res digital file. Our deliverable to you would be a Closed Caption Master (Basic Roll Up Style Captions).

Pricing for CC Master on DVCPRO25 (Basic Roll Up Style Captions)	\$235
Pricing for .scc file for Final Cut 7 (Basic Roll Up Style Captions)	\$210

Price includes transcription, Basic Roll Up Style closed captioning, encoding to DVCPRO25 or file preparation and output, and tape stock. Standard turnaround for your project is 3 business days. Expedited turnarounds are available for additional charge. Please note that as a regular weekly client we would waive rush charges for the occasional 2 day turnaround! Shipping and handling would be extra.

I've also attached a little "how to" sheet that explains what settings to choose in Final Cut 7 to add the caption data file (.scc file). I'll follow up with you tomorrow to discuss our quote and answer any questions you may have!

Best Regards,

Maria T. Vondras
Customer Service & Sales

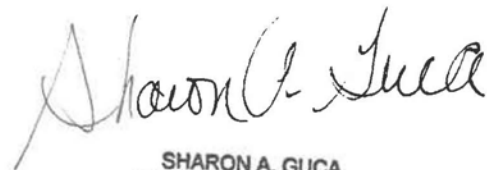
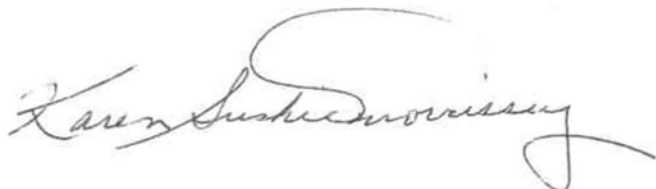


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445 12th St. SW
Washington DC 20554

Re: Request for Closed Captioning Exemption
CGB-CC-0537

As a producer of Glory to glory for New Testament Church, 6772 Lamphear Rd.,
Rome, NY that to the best of my knowledge all the statements contained in the
enclosed documents are true and correct.

Karen Suskie Morrissey
kim@mpgfilms.com
315-723-2601



SHARON A. GUCA
Reg. No. 01GU5051513
Notary Public, State of New York
Appointed in Oneida County
My Commission Expires Nov. 6, 2013